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10 Attorneys for Plaintiff
11 United States of America

12
13 IN THE UNITED STATES DISTRICT COURT
14
15 EASTERN DISTRICT OF CALIFORNIA

16 UNITED STATES OF AMERICA,

17 Plaintiff,

v.

18 ALFREDO ALVAREZ SANCHEZ,
19 RAUL MUÑOZ NAVARRO,
20 INOSENIO CRUZ

21 Defendants.

22 CASE NO. 1:24-CR-00305-JLT-SKO

23 STIPULATION AND ORDER REGARDING
24 EXCLUDABLE TIME PERIODS UNDER SPEEDY
25 TRIAL ACT;

26
27 STIPULATION

28 1. By previous order, this matter was set for status on June 18, 2025.
2. By this stipulation, defendants now move to continue the status conference until October 15, 2025, and to exclude time between June 18, 2025, and October 15, 2025, under Local Code T4.
3. The parties agree and stipulate, and request that the Court find the following:
a) The government has represented that the discovery associated with this case includes voluminous wiretap data, extractions of digital devices, photographs, videos, and over 83,000 pages of documents. All of this discovery has been either produced directly to counsel and/or made available for inspection and copying. Supplemental discovery has also been produced.
b) Counsel for defendants desire additional time consult with their clients, to review

1 the current charges, to conduct investigation and research related to the charges, to review and
2 copy discovery, to discuss potential resolutions, to prepare pretrial motions, and otherwise
3 prepare for trial.

4 c) Counsel for defendants believe that failure to grant the above-requested
5 continuance would deny them the reasonable time necessary for effective preparation, taking into
6 account the exercise of due diligence.

7 d) The government does not object to the continuance.

8 e) Based on the above-stated findings, the ends of justice served by continuing the
9 case as requested outweigh the interest of the public and the defendant in a trial within the
10 original date prescribed by the Speedy Trial Act.

11 f) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,
12 et seq., within which trial must commence, the time period of June 18, 2025 to October 15, 2025,
13 inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4]
14 because it results from a continuance granted by the Court at defendant's request on the basis of
15 the Court's finding that the ends of justice served by taking such action outweigh the best interest
16 of the public and the defendant in a speedy trial.

17 4. Nothing in this stipulation and order shall preclude a finding that other provisions of the
18 Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial
19 must commence.

20 IT IS SO STIPULATED.

21
22 Dated: June 4, 2025

MICHELE BECKWITH
Acting United States Attorney

23
24 /s/ ANTONIO PATACA
25 ANTONIO PATACA
26 Assistant United States Attorney
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1 Dated: June 4, 2025

/s/ CLEMENTE JIMENEZ
CLEMENTE JIMENEZ
Counsel for Defendant
RAUL NAVARRO

2
3
4 Dated: June 4, 2025

/s/ MARK REICHEL
MARK REICHEL
Counsel for Defendant
ALFREDO ALVAREZ SANCHEZ

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7
8 Dated: June 4, 2025

/s/ TONI WHITE
TONI WHITE
Counsel for Defendant
INOSENIO CRUZ

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14 **ORDER**

15 In light of the Defendant's arraignment on the superseding indictment on March 24, 2025, the
16 parties' request to continue the status conference from June 18, 2025, to October 15, 2025, at 1:00 p.m.
17 is GRANTED. Time is excluded through October 15, 2025, pursuant to 18 U.S.C. § 3161(h)(7)(A),
18 B(iv).

19 IT IS SO ORDERED.

20
21 Dated: 6/5/2025

22 *Sheila K. Oberto*

23 _____
24 The Honorable Sheila K. Oberto
UNITED STATES MAGISTRATE JUDGE